Supreme Court, U. S.
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MICHAEL RODAK, JR., CLERK

THE SUPREME COURT OF THE UNITED STATES

October Term, 1975

NO. 75-6289

INEZ MOORE

Appellant,

vs.

CITY OF EAST CLEVELAND, OHIO,

Appellee

On Appeal from the Supreme Court of the State of Ohio

MOTION OF AMERICAN CIVIL LIBERTIES UNION FOR LEAVE TO FILE BRIEF AMICUS CURIAE

David L. Genger
David B. Hopkins

Counsel for
The American Civil
Liberties Union
1144 Union Commerce Bldg.
Cleveland, Ohio 44115
(216) 696-1144

Now comes the American Civil Liberties Union, through its attorneys, and moves, pursuant to Rule 42(3) of the Rules of the Supreme Court of the United States, that this Honorable Court grant leave for the American Civil Liberties Union to file a brief amicus curiae on behalf of Appellant Inez Moore for the reasons more fully set out below.

The City of East Cleveland, Ohio, Appellee herein, has refused to consent to the filing of a brief amicus curiae by the American Civil Liberties Union.

The American Civil Liberties Union proposes to present to the court in its brief amicus curiae legal and sociological arguments establishing the fundamental nature of the rights of Family Association and Family Privacy which have been unjustifiably infringed upon by Sections 1351.02 and 1341.08 of the Ordinances of the City of East Cleveland, in violation of the First and Four-

teenth Amendments to the Constitution of the United States. The American Civil Liberties Union is a public interest organization, and, as such, represents somewhat broader interests than the individual Appellant in this action, Inez Moore, who seeks to establish that an ordinance which prevents a grandmother, her two sons and their respective sons from living together as a single family is unconstitutional. The American Civil Liberties Union anticipates that this Court will consider the broad constitutional implications of the Ordinances of the City of East Cleveland challenged herein and avers that the American Civil Liberties Union is an appropriate advocate for those broader interests.

Wherefore the American Civil Liberties Union prays that this Honorable Court grant leave to the American Civil Liberties Union

to file a brief amicus curiae in this action on behalf of Appellant, Inez Moore.

Respectfully submitted,

David L. Genger

David B. Hopkins
Attorneys for The American
Civil Liberties Union
1144 Union Commerce Building
Cleveland, Ohio 44115
(216) 696-1144